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NOTICE OF OBJECTION TO CONFIRMATION

PHH Mortgage Corporation has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

1. File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
400 Cooper Street, 4th Floor
Camden, New Jersey 08101**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Jaimie Finberg, Esquire
400 Fellowship Road, Suite 100
Mt. Laurel, New Jersey 08054-3422

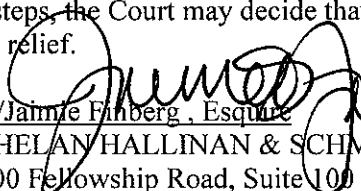
Isabel C Balboa, Trustee
535 Route 38, Suite 580
Cherry Hill, New Jersey 08002

2. Attend the hearing scheduled to be held on January 28, 2009 in the Camden Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
400 Cooper Street, 4th Floor
Camden, New Jersey 08101**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: December 2, 2008


/s/Jaimie Finberg, Esquire
PHELAN HALLINAN & SCHMIEG, PC
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054

CDT-2827

PHELAN HALLINAN & SCHMIEG, PC

By: Jaimie Finberg JF4696

400 Fellowship Road, Suite 100

Mt. Laurel, New Jersey 08054-3422

(856) 813-5500

Attorneys for Secured Creditor: PHH Mortgage Corporation

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:

MARY ANNE CHALMERS

CASE NO. 08-32777-JHW

CHAPTER 13

Debtor(s).

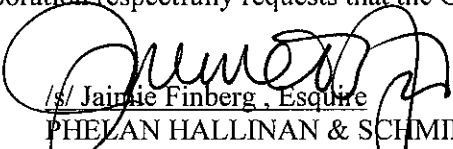
NOTICE OF OBJECTION TO
CONFIRMATION

Hearing Date: January 28, 2009

The undersigned, Phelan Hallinan & Schmieg, PC, attorneys for Secured Creditor, PHH Mortgage Corporation, the holder of a Mortgage on debtor(s) residence located at 2759 E Grant Avenue, Williamstown, NJ, hereby objects to the Confirmation of the debtor(s) proposed Chapter 13 Plan on the following grounds:

- 1) Secured Creditor has filed a Proof of Claim in the present proceeding for pre-petition arrears in the amount of \$27,102.00. Prior to the filing of the present Bankruptcy proceeding, Secured Creditor obtained a Final Judgment of Foreclosure entered by the Office of the Clerk of the Superior Court of New Jersey on July 3, 2008. We hereby object to debtor(s) proposed Plan for same does not account for tax disbursements to be made directly to the taxing authority nor yearly insurance to be paid and maintained by the debtor(s) on the aforementioned property.
- 2) During the course of Debtor's cure and maintain plan, the debtor has an ongoing right to modify the Chapter 13 Plan to satisfy the secured creditor through payment of the State Court Judgment. In the event debtor exercises this option, secured creditor seeks to ensure that any post judgment advances made in reliance on debtor's cure and maintain Plan would be recouped at the time of satisfaction of the judgment amount. Therefore, debtors is required to provide for these disbursements under the Chapter 13 Plan. Debtor(s) schedule "J" does not provide for monthly tax and insurance disbursements. Therefore, we hereby object to said Plan.
- 3) Furthermore, debtor(s) Chapter 13 Plan proposes to pay PHH Mortgage Corporation \$25,000.00 in pre-petition arrears, however, PHH Mortgage Corporation's Proof of Claim lists the pre-petition arrears at \$27,102.00.
- 4) Regarding paragraph three (3) of debtor(s) Chapter 13 Plan as it relates to the regular monthly payment amount (outside plan), Debtor(s) monthly post-petition mortgage payment amount is subject to change in accordance with the terms of the note and mortgage.

WHEREFORE, PHH Mortgage Corporation respectfully requests that the Confirmation of Debtor(s) Plan be denied.


/s/ Jaimie Finberg, Esquire

PHELAN HALLINAN & SCHMIEG, PC

400 Fellowship Road, Suite 100

Mount Laurel, NJ 08054

Dated: December 2, 2008